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AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
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UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

ALICIA KATHLEEN CRUZ,

Defendant.

CR16-127 RSM

INFORMATION

The United States Attorney charges that:

Count 1
(Bank Fraud)

A. The Scheme to Defraud

1. Beginning at a time unknown, but no later than about August 10, 2015, and continuing through September 4, 2015, at Kent, within the Western District of Washington, and elsewhere, the defendant, ALICIA CRUZ, participated in a scheme and artifice to defraud Banner Bank, Capital One, and Key Bank, financial institutions, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, and credits under the custody and control of those financial institutions by means of false and fraudulent pretenses, representations, and promises.

INFORMATION/CRUZ - 1

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1 2. It was the essence of the scheme to defraud that ALICIA CRUZ obtained
2 stolen checkbooks, check stock, and bank account numbers belonging to businesses or
3 individuals. ALICIA CRUZ then created counterfeit checks and forged the signatures of
4 the account holders and authorized signers on those accounts, without their authorization,
5 and deposited the unauthorized and counterfeit checks into her Banner Bank account.
6 Defendant then withdrew the proceeds of the fraudulent checks before Banner Bank was
7 able to determine that the checks were fraudulent, counterfeit and unauthorized.

8 **B. Execution of the Scheme to Defraud**

9 3. On or about August 25, 2015, at Kent, within the Western District of
10 Washington, and elsewhere, ALICIA CRUZ knowingly and willfully executed and
11 attempted to execute the scheme and artifice to defraud and to obtain moneys, funds, and
12 credits by means of false and fraudulent pretenses, representations, and promises, as set
13 forth above, in that ALICIA CRUZ presented to Banner Bank a counterfeit check in the
14 amount of \$3,800 bearing the Key Bank account number of Flexxstaff, a Washington
15 corporation, and the forged signature of T.W., an authorized signer on that account.

16 All in violation of Title 18, United States Code, Section 1344 and Section 2.

17
18 **Count 2**
19 **(Aggravated Identity Theft)**

20 4. The United States Attorney re-alleges and incorporates paragraphs 1-3 of
21 this Information as if fully set forth herein.

22 5. On or about August 25, 2015, at Kent, within the Western District of
23 Washington, ALICIA CRUZ knowingly possessed and used, without lawful authority, a
24 means of identification of another person, to wit, the name of T.W. a real person, during
25 and in relation to a felony listed in Title 18, United States Code, Section 1028A(c),


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27 //


1 specifically, Bank Fraud, in violation of Title 18, United States Code, Section 1344.

2 All in violation of Title 18, United States Code, Section 1028A.

3 DATED: May 2, 2016

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6 
JANNETTE L. HAYES
United States Attorney

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ANDREW FRIEDMAN
Assistant United States Attorney

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11
12 
SETH WILKINSON
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